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August 15, 2008

BY FASCIMILE

The Honorable Loretta A. Preska
United States District Judge
United States Courthouse
500 Pearl Street, Room 1320
New York, New York 10007

Re: United States v. Aaron Gadson, et al.
S1 08 Cr. 070 (LAP)

Dear Judge Preska:

This letter is respectfully submitted on behalf of defendant Felix Pearcey to request an extension of time of thirty (30) days to file pretrial motions in the above-captioned case. Despite our best efforts, including hiring of additional personnel, review of the extensive discovery in this case has taken more time than initially expected. Indeed, alone, Mr. Pearcey has over 21,000 wiretaps attributed to him that must be reviewed to prepare competent motions. Defendants Aaron Gadson, Andrew Cowan, Calvin Grant, Devin Paul and Randy King (together, with Felix Pearcey "Defendants") join in the instant application.¹ The government consents to the Defendants' thirty (30) day extension request. No previous request for an extension of time to file motions has been made.

Currently, defense motions are due on August 25, 2008, with the government's reply due on September 15, 2008, and oral argument scheduled for October 15, 2008. All parties consent to the proposed Revised Scheduling Order:

Defense Motions due: **September 22, 2008**

Government Reply due: **October 22, 2008**

Oral Argument date: **November 22, 2008**

¹ Defendant Akiem Luke consents, but does not join, in Defendants' application.

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Therefore, we respectfully request that the Court grant the instant Proposed Revised Scheduling Order.

Respectfully submitted,



Mariel LaSasso

IT IS SO ORDERED

Dated: New York, New York
August __, 2008

LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE